



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278*

January 13, 2025

BY ECF

The Honorable Sidney H. Stein
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

**Re: *United States v. Nadine Menendez,*
S4 23 Cr. 490 (SHS)**

Dear Judge Stein:

The Government respectfully writes in the above-captioned matter to update its estimate regarding the length of the upcoming trial in light of the status of its discussions with counsel for the defendant regarding stipulations.

This morning, counsel for the defendant informed the Government—for the first time following the initiation of discussions regarding stipulations on November 21, 2024—that “as a general matter [he] tend[s] to be extremely loathe to stipulate in criminal cases”, although he represented he is keeping an open mind, without elaborating. The Government will continue to pursue potential stipulations with the defendant, but in light of this indication believes it prudent to assume, for present planning purposes, that trial will last at least up to and including the ten weeks previously projected by defense counsel (Dkt. 679 at 3) or potentially longer. The Government is still in the process of assessing how many additional custodial, chain-of-custody,

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and similar witnesses would be necessitated by the failure to reach any stipulations, but presently believes that number is in excess of approximately 90 additional witnesses.

Respectfully submitted,

MATTHEW PODOLSKY

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Authority Conferred by 28 U.S.C. § 515

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cc: (by ECF)

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